

IN REPLY
REFER TO: AIR-3

Peter Cante
Manager, Engineering Division
Santa Barbara County APCD
26 Castilian Drive B-23
Goleta, CA 93117

Dear Mr. Cante:

EPA appreciates the opportunity to comment on the draft Title V permit prepared by the District for the Southern California Gas Company, Goleta Plant.

EPA reviewed the submitted materials and does have some concerns and questions regarding the Title V permit. Our detailed comments are attached.

If you have any questions regarding these comments, please contact Steve Branoff or Bob Baker of our Permits Office at (415) 744-1290 and (415) 744-1258 respectively.

Sincerely,

Matt Haber
Chief, Permits Office
Air Division

Enclosure

cc: Sanjib Mukherji, SBAPCD

EPA Comments
SoCal Gas, La Goleta Plant
Santa Barbara permit 9584-01

1. The periodic monitoring for emission limits on internal combustion engines is inadequate to assure compliance with applicable requirements. The test methods required in the permit (summarized in table 9.1.3) are appropriate, but testing for many of the engines is required only biennially. Some of these engines are required to be tested annually, and EPA believes that this condition should be expanded to cover all of the IC engines at the source. The majority of the potential to emit at this source is attributable to the IC engines, so frequent monitoring of these units is essential to guarantee compliance with the facility-wide potential to emit.
2. Table 9.2.3 indicates that there are emissions of VOCs from the dehydration/storage units, but this equipment is missing from Table 5.3 ("Permitted Emissions for Each Emission Unit Category") and Table 5.5 ("Federal Potential to Emit for the Stationary Source"). PTO 9128 is missing from the district's appendix of all applicable permits for this source. The application from the source contained the permit, but the page with all of the requirements for the permitted units is missing. These emissions should at least be included under the list of permitted emissions, and, if they are federally enforceable limits, they should also be included in the federal potential to emit. Some other requirements from PTO 9128 are listed in the Title V permit, but it is impossible to determine if all of the permit conditions have been included. Any conditions from this permit that have been overlooked in the draft permit should be included in the final version. In addition, PTO 8335 is also missing from the district's appendix. The source did include the whole permit in this case, though, and the Title V permit appears to include all applicable requirements.
3. Emissions from the dehydration plant (PTO 8166) and emissions from the refueling station (PTO 6819) are listed as zero in Table 5.5 ("Federal Potential to Emit for the Stationary Source") but they are included in Table 5.3 ("Permitted Emissions for Each Emission Unit Category") on the previous page. If these units are subject to permit conditions or regulations which are enforceable only by the District, this was not made clear in the permit.
4. In section 9 of the permit, the subsections containing reporting requirements refer to permit conditions that do not exist. For example, section 9.2.E refers to the "Recordkeeping conditions 9.2.4 (a) through (f) of this permit," but conditions numbered in this way do not appear anywhere in section 9. In addition, the recordkeeping requirements in section 9.2.D are mentioned separately here, which implies that there is a separate section with recordkeeping requirements that has been mis-labeled as 9.2.4. Please clarify the information in this section.

Questions for the District:

1. The district indicated on their Electronic Permit Submittal System (EPSS) permit summary page that the facility emits 10 tpy or more of a single hazardous air pollutant (HAP). A MACT standard for oil and natural gas production facilities is due next year. When this happens, this permit may require reopening in order to add these requirements. If they are not added before the next renewal date, these requirements should be added at that time (assuming that standard has been promulgated.) In section 4.2, HAP emissions from the IC engines are listed, but these do not show emissions of 10 tpy of any one pollutant. Are the emissions from other equipment at the source? If so, why were HAP emissions only calculated for IC engines?
2. What are "reevaluation analyses?" For our own information about Santa Barbara's procedures, we would like to know what prompts these. For example, are these done every time a permit is renewed, or are there special circumstances that trigger them?